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*Attorneys for Defendants Estate of Seymour Epstein,  
Muriel Epstein, as Executrix of the Estate of Seymour  
Epstein and as Trustee of the Trusts created by the Last  
Will and Testament of Seymour Epstein and Shelburne  
Shirt Company, Inc.*

**UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)  
SIPA LIQUIDATION  
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

ESTATE OF SEYMOUR EPSTEIN, MURIEL  
EPSTEIN, as Executrix of the Estate of Seymour  
Epstein, and as trustee of Trusts created by the Last  
Will and Testament of Seymour Epstein, HERBERT  
C. KANTOR, as trustee of Trusts created by the Last  
Will and Testament of Seymour Epstein, and  
SHELburne SHIRT COMPANY, INC.,

Defendants.

Adv. Pro No. 10-04438 (SMB)

**NOTICE OF MOTION TO WITHDRAW THE REFERENCE**

**TO THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**PLEASE TAKE NOTICE** that Defendants Estate of Seymour Epstein, Muriel Epstein, as Executrix of the Estate of Seymour Epstein and as Trustee of the Trusts created by the Last Will and Testament of Seymour Epstein and Shelburne Shirt Company, Inc. (collectively, “Defendants”), respectfully move the United States District Court for the Southern District of New York at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules for the Southern District of New York, for an Order withdrawing the reference of the above-captioned adversary proceeding from the United States Bankruptcy Court for the Southern District of New York for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Defendants respectfully request that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: New York, New York  
February 14, 2020

**CHAITMAN LLP**

By: /s/ Helen Davis Chaitman  
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